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*Jeffrey M. Nelson*  
*Chief Legal Officer*

October 15, 2018

**VIA ELECTRONIC FILING**

David Butler, Esq.  
 Hearing Officer  
 Public Service Commission of South Carolina  
 101 Executive Center Drive, Suite 100  
 Columbia, South Carolina 29210

Re: **Consolidated Docket Nos.: 2017-207-E; 2017-305-E; and 2017-370-E**  
*Order of Presentation of Witnesses in Merits Hearing*  
 Request for Clarification and/or Modification of Order No. 2018-140-H

Dear Mr. Butler:

After reviewing Order No. 2018-140-H, the South Carolina Office of Regulatory Staff ("ORS") is concerned that there may be a misunderstanding that ORS's Rebuttal testimony currently due to be filed on October 24, 2018, is limited to two witnesses.<sup>1</sup>

On September 25, 2018, South Carolina Electric & Gas Company ("SCE&G") filed the same direct testimonies of the witnesses who submitted testimony in Docket No. 2017-370-E, stating: "Because this testimony addresses many of the issues raised here, that pre-filed testimony is attached as Exhibit \_\_ (JEA-1A) to this testimony and incorporated by reference into my pre-filed direct reply testimony in this docket."<sup>2</sup>

<sup>1</sup> ORS will present the direct testimonies of Anthony James and Elizabeth Warner plus any rebuttal testimonies they may file.

<sup>2</sup> SCE&G submitted the same testimony for Jimmy Addison, Griffin, Hevert, Hubbard, Kochems, Lapson, Lynch, and Young as that pre-filed in Docket No. 2017-370-E. SCE&G did submit pre-filed testimony for Petrunick which was not previously submitted in Docket No. 2017-370-E.

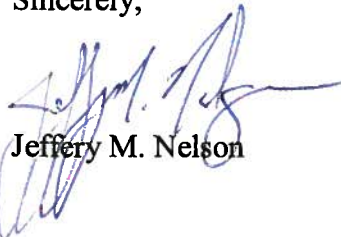
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It has been ORS's plan and intent to follow SCE&G's approach to incorporate by reference the testimony ORS submitted on September 25, 2017 for all its witnesses and address the testimony of Mr. Petrunick.<sup>3</sup> Additionally, ORS may choose to utilize testimony of those witnesses identified on the list of witnesses submitted on October 15, 2018, as required by Order No. 2018-130-H.

As a result of SCE&G incorporating its direct testimony submitted in Docket No. 2017-380-E into 2017-305-E, ORS respectfully requests that the Hearing Officer clarify or reconsider whether ORS should be required to present all its witnesses a second time. ORS believes that Order No. 2018-140-H as currently written, would result in elongating the November proceeding.

Thank you for your consideration in this matter, and we respectfully request your guidance as soon as possible on this matter.

Sincerely,



Jeffery M. Nelson

cc: Joseph Melchers, Esquire (via Email)  
All Parties (via Email)

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<sup>3</sup> As a practical matter, ORS notes that all prefiled testimony is being included under each of the consolidated dockets on the Commission's docket management system (DMS). Thus, ORS's testimony filed on September 25, 2018, is already reflected in the 2017-305-E docket on DMS.